

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

VITALE AML CONSULTANTS, INC.,

Plaintiff,

v.

PROMONTORY FINANCIAL GROUP, LLC;
PROMONTORY FORENSIC SOLUTIONS,
LLC; HANI SAMAAAN; PROMINENT IT
SOLUTIONS, INC.; RONALD ROSE; AML
CONSULTING SERVICES, INC.; and JOHN
DOES (1-10),

Defendants.

X

:

:

:

:

:

:

:

:

:

:

:

:

:

:

X

Case No. 1:08-cv-1315
(RMB)(RLE)

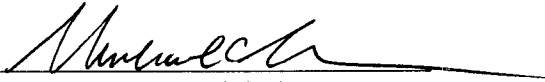
**NOTICE OF MOTION
TO ADMIT COUNSEL
*PRO HAC VICE***

ECF Case

PLEASE TAKE NOTICE that, upon the annexed Declarations of Emily Johnson Henn and Michael C. Nicholson, and the exhibits attached thereto, Defendants Promontory Financial Group, LLC and Promontory Forensics Solutions, LLC will move this Court, before the Honorable Richard M. Berman, at the United States Courthouse, 500 Pearl Street, Room 21D, New York, New York as soon as counsel may be heard, for an Order pursuant to Local Civil Rule 1.3(c) of this Court admitting Emily Johnson Henn *pro hac vice* for all purposes in connection with the above-captioned action, and for such other and further relief as the Court may deem just and proper.

Dated: New York, New York
July 3, 2008

COVINGTON & BURLING LLP

By: 
Michael C. Nicholson

P. Benjamin Duke
The New York Times Building
620 Eighth Avenue
New York, New York 10018-1405
(212) 841-1000
pbduke@cov.com
mcnicholson@cov.com

Anthony Herman
Joshua A. Doan
COVINGTON & BURLING LLP
1201 Pennsylvania Avenue, N.W.
Washington, D.C. 20004-2401
(202) 662-6000
aherman@cov.com
jdoan@cov.com

*Attorneys for Defendants
Promontory Financial Group, LLC, and
Promontory Forensics Solutions, LLC*

TO:

<p>Dale M. Cendali, Esq. Rhett Millsaps, Esq. Claudia Ray, Esq. Johanna Schmitt, Esq. O'Melveny & Myers LLP Times Square Tower 7 Times Square New York, NY 10036 dcendali@omm.com rmillsaps@omm.com cray@omm.com jschmitt@omm.com</p> <p><i>Attorneys for Plaintiff</i></p>	<p>Jay B. Itkowitz, Esq. Itkowitz & Harwood 305 Broadway New York, New York 10007 jitkowitz@itkowitz.com</p> <p><i>Attorneys for Defendants Hani Samaan, Prominent IT Solutions, Inc., Ronald Rose, and AML Consulting Services, Inc.</i></p>
---	---

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

VITALE AML CONSULTANTS, INC.,

Plaintiff,

v.

PROMONTORY FINANCIAL GROUP, LLC;
PROMONTORY FORENSIC SOLUTIONS,
LLC; HANI SAMAAAN; PROMINENT IT
SOLUTIONS, INC.; RONALD ROSE; AML
CONSULTING SERVICES, INC.; and JOHN
DOES (1-10),

Defendants.

X

:

:

:

:

:

:

:

:

:

:

:

:

X

Case No. 1:08-cv-1315
(RMB)(RLE)

**DECLARATION OF
MICHAEL C. NICHOLSON**

ECF Case

Michael C. Nicholson declares as follows pursuant to 28 U.S.C. § 1746:

1. I am special counsel with the firm of Covington & Burling LLP, counsel for Promontory Financial Group, LLC and Promontory Forensics Solutions, LLC (collectively, “Promontory”) in the above-captioned action. I was admitted to practice before the U.S. District Court for the Southern District of New York on August 16, 1994, and remain in good standing therein. I submit this declaration in support of Promontory’s Motion to Admit Counsel *Pro Hac Vice* in connection with this action, pursuant to Local Civil Rule 1.3(c) of this Court.

2. I am familiar with Applicant Emily Johnson Henn, as she is a colleague with Covington & Burling LLP, practicing out of Covington’s Washington, D.C. office. I believe the Applicant to be an attorney of good character, competence, and experience.

3. Accompanying this declaration is the Declaration of Emily Johnson Henn, describing her experience and her familiarity with the Federal Rules of Civil Procedure, the Federal Rules of Criminal Procedure, the Federal Rules of Evidence, and the Local Rules of the United States District Court for the Southern and Eastern Districts of New York.

4. For the foregoing reasons, I respectfully request that the motion be granted. For the Court's convenience, a copy of a proposed order granting Promontory's motion is attached hereto as Exhibit A.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 3rd day of July, 2008, in New York, New York.



Michael C. Nicholson

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

VITALE AML CONSULTANTS, INC.,

Plaintiff,

v.

PROMONTORY FINANCIAL GROUP, LLC;
PROMONTORY FORENSIC SOLUTIONS,
LLC; HANI SAMAAAN; PROMINENT IT
SOLUTIONS, INC.; RONALD ROSE; AML
CONSULTING SERVICES, INC.; and JOHN
DOES (1-10),

Defendants.

X

:

:

:

:

:

:

:

:

:

:

:

:

:

X

Case No. 1:08-cv-1315 (RMB)

**ORDER FOR ADMISSION
PRO HAC VICE ON
WRITTEN MOTION**

ECF Case

This matter having been brought before the Court by Defendants Promontory Financial Group, LLC and Promontory Forensics Solutions, LLC, through counsel Covington & Burling LLP, by motion pursuant to Local Civil Rule 1.3(c) for an order admitting Emily Johnson Henn *pro hac vice*, on notice to all parties hereto, and the Court having reviewed and considered the papers filed in support of this motion, and in opposition thereto, if any, it is hereby

ORDERED that Emily Johnson Henn be and hereby is admitted *pro hac vice* in connection with this action and she shall abide by the provisions of the Local Rules of this Court in all respects and be subject to the disciplinary jurisdiction of the Court in accordance with Local Civil Rule 1.5.

SO ORDERED:

U.S.D.J.

CERTIFICATE OF SERVICE

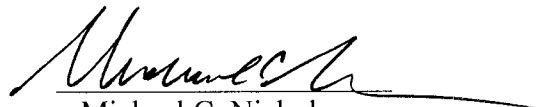
I hereby certify that I caused true and correct copies of the foregoing **Notice of Motion to Admit Counsel Pro Hac Vice** dated July 3, 2008, with supporting **Declaration of Emily Henn**, dated July 2, 2008, and **Declaration of Michael C. Nicholson**, dated July 3, 2008, to be served via electronic mail, pursuant to the agreement of counsel for the parties, upon the following counsel of record in the within action (08-CV-1315 (RMB) (RLE)), on this 3rd day of July, 2008:

Dale M. Cendali, Esq.
Rhett Millsaps II, Esq.
Claudia Ray, Esq.
Johanna Schmitt, Esq.
O'Melveny & Myers LLP
Times Square Tower
7 Times Square
New York, NY 10036
dcendali@omm.com
rmillsaps@omm.com
cray@omm.com
jschmitt@omm.com

Attorneys for Plaintiff

Jay B. Itkowitz, Esq.
Itkowitz & Harwood
305 Broadway
New York, New York 10007
jitektowitz@itektowitz.com

*Attorneys for Defendants Hani Samaan,
Prominent IT Solutions, Inc.,
Ronald Rose, and
AML Consulting Services, Inc.*


Michael C. Nicholson

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

VITALE AML CONSULTANTS, INC.,	:	X
	:	
Plaintiff,	:	Case No. 1:08-cv-1315 (RMB)
	:	
v.	:	
	:	DECLARATION OF
PROMONTORY FINANCIAL GROUP, LLC;	:	EMILY JOHNSON HENN
PROMONTORY FORENSIC SOLUTIONS,	:	
LLC; HANI SAMAAAN; PROMINENT IT	:	
SOLUTIONS, INC.; RONALD ROSE; AML	:	
CONSULTING SERVICES, INC.; and JOHN	:	
DOES (1-10),	:	ECF Case
	:	
Defendants.	:	
	:	X

Emily Johnson Henn declares as follows pursuant to 28 U.S.C. § 1746:

1. I am a partner with the firm of Covington & Burling LLP, resident of the District of Columbia, and counsel for Defendants Promontory Financial Group, LLC and Promontory Forensics Solutions, LLC (together, "Promontory") in the above-captioned matter.

2. I submit this Declaration in support of Promontory's Motion to Admit Counsel *pro hac vice* in connection with this action pursuant to Local Civil Rule 1.3(c) of this Court.

3. I have been admitted to practice in the District of Columbia since March 9, 2001, and I am currently in good standing in the Bar of the District of Columbia. A certificate of good standing from the District of Columbia Court of Appeals is annexed hereto as Exhibit 1. I

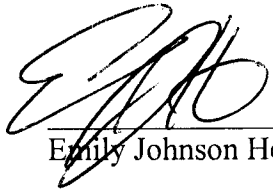
have been admitted to practice in the Commonwealth of Maryland since December 15, 1999. A certificate of good standing for the Commonwealth of Maryland is annexed hereto as Exhibit 2.

4. I have read and am familiar with (a) the provisions of the Judicial Code which pertain to the jurisdiction of, and practice in, the United States District Courts; (b) the Federal Rules of Civil Procedure; (c) the Federal Rules of Criminal Procedure; (d) the Federal Rules of Evidence; and (e) the Local Rules of the United States District Court for the Southern and Eastern Districts of New York.

5. I will faithfully adhere to all rules applicable to my conduct in connection with any activities of this Court.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 2nd day of July, 2008 in Washington, D.C.



Emily Johnson Henn



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

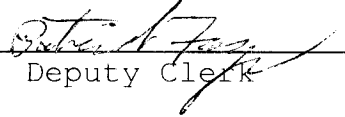
I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

EMILY J. HENN

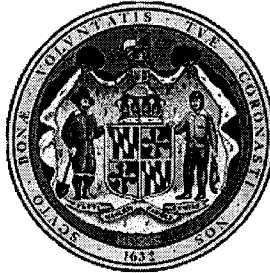
was on the 9TH day of MARCH, 2001,
duly qualified and admitted as an attorney and counselor and
entitled to practice before this Court and is, on the date
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this
Court at the City of
Washington, D.C., on June
18, 2008.

GARLAND PINKSTON, JR., CLERK

By: 
Deputy Clerk

**Court of Appeals
of Maryland
Annapolis, MD**



CERTIFICATE OF GOOD STANDING

STATE OF MARYLAND, ss:

*I, Bessie M. Decker, Clerk of the Court of Appeals of Maryland,
do hereby certify that on the fifteenth day of December, 1999,*

Emily Johnson Henn

*having first taken and subscribed the oath prescribed by the Constitution and
Laws of this State, was admitted as an attorney of said Court, is now in good
standing, and as such is entitled to practice law in any of the Courts of said
State, subject to the Rules of Court.*

In Testimony Whereof, *I have hereunto
set my hand as Clerk, and affixed the Seal
of the Court of Appeals of Maryland, this
twenty-third day of June, 2008.*

Bessie M. Decker

Clerk of the Court of Appeals of Maryland

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

VITALE AML CONSULTANTS, INC.,

Plaintiff,

v.

PROMONTORY FINANCIAL GROUP, LLC;
PROMONTORY FORENSIC SOLUTIONS,
LLC; HANI SAMAAAN; PROMINENT IT
SOLUTIONS, INC.; RONALD ROSE; AML
CONSULTING SERVICES, INC.; and JOHN
DOES (1-10),

Defendants.

X

:

:

:

:

:

:

:

:

:

:

:

:

:

:

X

Case No. 1:08-cv-1315 (RMB)

**ORDER FOR ADMISSION
PRO HAC VICE ON
WRITTEN MOTION**

ECF Case

This matter having been brought before the Court by Defendants Promontory Financial Group, LLC and Promontory Forensics Solutions, LLC, through counsel Covington & Burling LLP, by motion pursuant to Local Civil Rule 1.3(c) for an order admitting Emily Johnson Henn *pro hac vice*, on notice to all parties hereto, and the Court having reviewed and considered the papers filed in support of this motion, and in opposition thereto, if any, it is hereby

ORDERED that Emily Johnson Henn be and hereby is admitted *pro hac vice* in connection with this action and she shall abide by the provisions of the Local Rules of this Court in all respects and be subject to the disciplinary jurisdiction of the Court in accordance with Local Civil Rule 1.5.

SO ORDERED:

U.S.D.J.